



DEPARTMENT OF NATURAL RESOURCES

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MEMORANDUM

DATE: November 7, 2005

TO: Mohamad Alhalabi, Director
St. Louis Regional Office

FROM: James L. Kavanaugh, Interim Director *Original Signed by James L. Kavanaugh*
Air Pollution Control Program

SUBJECT: Stage I/Stage II Vapor Recovery Enforcement Policy – Expiration of Vapor Recovery Components

Recently the California Air Resources Board has required that an expiration date be stamped on certain vapor recovery components. For example, all new breakaways are required to have a stamped on expiration date. This date represents the maximum reliable life span of the product according to the manufacturer. Use beyond the expiration date constitutes failure to maintain the component with manufacturers' instructions and renders the Missouri Performance Evaluation Test Procedures (MOPETP) approval void.

As a result of this new requirement, inspectors must check vapor recovery components that fall into this new requirement for an expiration date. If the component is expired the inspector must follow the standard enforcement procedure for use of non-MOPETP approved components.

Currently there are vapor recovery components in use in the St. Louis non-attainment area that fall into this expiration date requirement which do not have an expiration date stamped onto the component. For example, the Husky 3360 breakaway is now required to have an expiration date stamped onto the component, however, a number of these breakaways were manufactured prior to this requirement and have no expiration date stamped on them. As a result, the Air Pollution Control Program will allow components that fall into this category to remain in use until May 30, 2010. This will be the expiration date for all components that fall into this category. If a component within this category is found to be in use after this date the inspector must follow the standard enforcement procedure for use of non-MOPETP approved components.

Thank you for your assistance in implementing this new policy.

JLK:rsd

c: Air Pollution Control Program, Policy Manual
City of St. Louis, Division of Air Pollution Control
St. Louis County Department of Health, Air Pollution Control Section

